

EXHIBIT A

*Valley Health System, LLC d/b/a Centennial Hills
Hospital and Medical Center's Reply to Plaintiff's
Opposition to Defendant Valley Health System's Motion
for Summary Judgment (and any Joinders Thereto)*

EXHIBIT A

LELAND J. NELSON
VILELA vs VALLEY HEALTH SYSTEM

July 09, 2018

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<p>1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 4 AMY VILELA, an individual; 5 JOZETTE FIGUEROA, an individual; 6 AMY VILELA, a Special Administrator 7 of the Estate of SHALYNNE RAMOS, 8 Plaintiffs, 9 vs. CASE NO. 2:16-CV-01503 10 VALLEY HEALTH SYSTEM, LLC, d/b/a 11 CENTENNIAL HILLS HOSPITAL MEDICAL 12 CENTER, a Nevada Limited Liability 13 Company; UNIVERSAL HEALTH SERVICES 14 OF DELAWARE, INC., a Delaware 15 corporation; TANYA NETZ, PAC; JILL 16 MCATEE, RN; DOE Defendants I 17 through X, inclusive; ROE NURSES 18 I through XX, inclusive; ZOE 19 HOSPITALS or OTHER MEDICAL 20 FACILITIES I through X; and 21 ROE CORPORATIONS I through X, 22 inclusive, 23 Defendants. 24 25 DEPOSITION OF LELAND JAMES NELSON July 9, 2018 10:00 a.m. 7900 West Sahara Avenue Suite 200 Las Vegas, Nevada Gary F. Decoster, CCR No. 790</p>	<p>1 INDEX OF EXAMINATION 2 3 WITNESS: LELAND JAMES NELSON 4 5 By Mr. Tyler 4 6 By Mr. Weiss 78 7 By Mr. Gish 88 8 By Mr. Weiss 89 9 By Mr. Gish 90 10 11 12 13 14 15 16 17 INDEX TO EXHIBITS 18 19 Exhibit Description Initial 20 Reference 21 A Text messages 69 22 23 24 25</p>
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<p>1 APPEARANCES OF COUNSEL 2 3 For the Plaintiffs: 4 LAW OFFICES OF CASEY D. GISH 5 CASEY D. GISH, ESQ. 6 5940 South Rainbow Boulevard 7 Las Vegas, Nevada 89118 8 702.583.5883 9 702.483.4608 Fax 10 casey@gishlawfirm.com 11 12 For the Defendants Valley Health System, LLC 13 d/b/a Centennial Hills Hospital Medical Center 14 and Jill Mcatee, RN: 15 HALL PRANGLE & SCHOONVELD, LLC 16 CASEY TYLER, ESQ. 17 1160 North Town Center Drive 18 Suite 200 19 Las Vegas, Nevada 89144 20 702.889.6400 21 702.384.6025 Fax 22 ctyler@hpslaw.com 23 24 For the Defendant Tanya Netz, PAC: 25 JOHN H. COTTON & ASSOCIATES, LTD. TODD WEISS, ESQ. 7900 West Sahara Avenue Suite 200 Las Vegas, Nevada 89117 702.832.5909 702.832.5910 Fax tweiss@jhcottonlaw.com</p>	<p>1 Deposition of Leland James Nelson 2 July 9, 2018 3 (Prior to the commencement of the 4 deposition, all of the parties present agreed to 5 waive statements by the court reporter, pursuant 6 to Rule 30(b)(4) of NRC.P.) 7 8 LELAND JAMES NELSON, having been first duly 9 sworn, was examined and testified as follows: 10 EXAMINATION 11 BY MR. TYLER: 12 Q. Good morning. I introduced myself briefly 13 before we went on the record. My name is Casey Tyler. 14 I represent Valley Health Systems, which would be 15 Centennial Hills Hospital, in certain litigation 16 that's been filed on behalf of Shalynne as well as her 17 family. 18 You're here to testify as a fact witness 19 regarding certain circumstances that happened with 20 regard to the underlying facts of the case; do you 21 understand that? 22 A. Yes. 23 Q. Okay. Have you ever given a deposition 24 before? 25 A. No.</p>

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<p style="text-align: right;">Page 33</p> <p>1 remember him being there, so . . .</p> <p>2 Q. And just him or did he have the other kids</p> <p>3 with him, too?</p> <p>4 A. I think it was just him because I think the</p> <p>5 babysitter came. I think the babysitter maybe was --</p> <p>6 was she there?</p> <p>7 Q. You'd probably remember little kids running</p> <p>8 around an ER, though. They weren't there?</p> <p>9 A. Yeah, they weren't -- I know the kids weren't</p> <p>10 there. I know the little kids weren't there.</p> <p>11 Q. Okay. So when you first walked in the</p> <p>12 hospital, all three of you were present?</p> <p>13 A. It was -- I want to say -- no, actually, no,</p> <p>14 it was just me and Shalynne, and then the dad came</p> <p>15 about maybe five minutes later.</p> <p>16 Q. So once you walk into the ER, I'm assuming</p> <p>17 you go over to the intake area?</p> <p>18 A. Um-hum.</p> <p>19 Q. That's a yes, right?</p> <p>20 A. Oh, yes.</p> <p>21 Q. Okay. Describe for me then what happens once</p> <p>22 you get to the intake area.</p> <p>23 A. She goes up there. She tells them, you know,</p> <p>24 her knee hurts. And she's calmed down a little bit</p> <p>25 then, so she's like my knee and like my lower leg is</p>	<p style="text-align: right;">Page 35</p> <p>1 see if he can -- if he can do something to where she</p> <p>2 can be on his insurance or if it's possible that she</p> <p>3 can be on his insurance, and he's on the phone with</p> <p>4 his insurance people. I guess they pretty much said</p> <p>5 that no, and then we sit and wait.</p> <p>6 Q. At what point had the stepdad arrived? Is</p> <p>7 that while she's filling out the paperwork?</p> <p>8 A. She's filling out the paperwork. By the time</p> <p>9 we got the paperwork he came already. He was already</p> <p>10 there sitting down with us.</p> <p>11 Q. Okay. When they said -- when she told them</p> <p>12 that she didn't have insurance, did they say that we</p> <p>13 can't treat you at all or just that it might be really</p> <p>14 expensive or do you remember any of the specifics</p> <p>15 about how that conversation went?</p> <p>16 A. Well, they said we might not be able to help</p> <p>17 out that much and it's going to be -- that she did --</p> <p>18 that they said it's going to be -- that it could</p> <p>19 possibly be really expensive if you don't have</p> <p>20 insurance.</p> <p>21 Q. So they never specifically said we won't</p> <p>22 treat you. They just said without your insurance,</p> <p>23 this might cost a lot of money?</p> <p>24 MR. GISH: Asked and answered,</p> <p>25 mischaracterizes his testimony.</p>
<p style="text-align: right;">Page 34</p> <p>1 starting like -- is starting to hurt. And then they</p> <p>2 asked to have her fill out paperwork and they ask if</p> <p>3 she has insurance.</p> <p>4 Q. As far as what she initially complained, she</p> <p>5 told them her knee hurts. What -- do you remember</p> <p>6 anything specific or you just remember just generally</p> <p>7 this is what she said?</p> <p>8 A. Like I just remember her saying that her knee</p> <p>9 hurts and that her leg is starting to hurt because she</p> <p>10 -- like I said, she calmed down some, so it was like</p> <p>11 she started feeling --</p> <p>12 Q. Okay. She starts to fill out the paperwork.</p> <p>13 They ask if she has insurance. Then what happens</p> <p>14 next?</p> <p>15 A. She says no, she says she doesn't have</p> <p>16 insurance, and they say, you know, well, we don't know</p> <p>17 how much -- how much we -- what we can -- how much we</p> <p>18 can do because you don't have insurance.</p> <p>19 Q. They said we don't know how much we can do</p> <p>20 because you don't have insurance?</p> <p>21 A. Yes.</p> <p>22 Q. And this is the same intake person?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. What happens next?</p> <p>25 A. She -- her stepdad is there, so he tried to</p>	<p style="text-align: right;">Page 36</p> <p>1 Go ahead, you can answer.</p> <p>2 BY MR. TYLER:</p> <p>3 Q. You can answer.</p> <p>4 A. Oh. Say it again.</p> <p>5 Q. Sure. It wasn't something where they</p> <p>6 specifically said, well, if you don't have insurance,</p> <p>7 tough luck, we're not going to treat you. It was more</p> <p>8 of something along the lines of we might be able to</p> <p>9 treat you, but it might cost you a lot of money?</p> <p>10 MR. GISH: Same objections.</p> <p>11 Go ahead and answer.</p> <p>12 THE DEPONENT: Well, I remember them saying</p> <p>13 it was going to be expensive and I remember them</p> <p>14 saying that we don't know how much we can possibly</p> <p>15 help you.</p> <p>16 BY MR. TYLER:</p> <p>17 Q. What I'm trying to understand, was there a</p> <p>18 point where they ever said we can't treat you without</p> <p>19 insurance, period, or was it more of --</p> <p>20 A. No, they didn't say -- no, they didn't say we</p> <p>21 can't treat you, period.</p> <p>22 Q. Okay. But they did say if we treat you</p> <p>23 without insurance, it might be expensive?</p> <p>24 A. They did say that later on, I think.</p> <p>25 Q. So at that point I'm assuming you're going to</p>

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<p style="text-align: right;">Page 53</p> <p>1 I've examined your leg, it looks like you might need 2 surgery, but in order to have surgery completed, you 3 need to go see a specialist and you need to get 4 insurance; was that how it unfolded? I'm just trying 5 to understand. 6 A. Yeah. 7 Q. Okay. 8 A. I think she -- like the specialist is 9 supposed to do surgery or something like that, not 10 them. 11 Q. Okay. So the issue with the insurance and 12 need to see a specialist was with regard to potential 13 surgery? 14 A. Well, the way I understood it was that it 15 seemed like the specialist was going to do the surgery 16 or something like that. 17 Q. Any other recollection of that interaction 18 with the PA? 19 A. No, just pretty much what I told you. She 20 just told us to sit here and wait. 21 Q. So other than, you know, we can't do a 22 surgery here in the ER, you're going to need to follow 23 up with a specialist on that, was there any other care 24 that they said that they wouldn't or couldn't provide? 25 A. They just said they couldn't -- they couldn't</p>	<p style="text-align: right;">Page 55</p> <p>1 I just felt like it should have been like, like more 2 and like she should like -- I felt like she should 3 have did more, I don't know what, but I felt like she 4 should have did more other than just say, oh, well, 5 she looked at it, oh, yeah, you might need surgery, 6 you need insurance, go to a specialist, and that was 7 it. 8 Q. Okay. And to make sure we're clear -- 9 A. And -- 10 Q. -- you know for sure she looked at the x-ray? 11 A. Um-hum. 12 Q. And she explained the x-ray? 13 A. Um-hum. 14 Q. Those are yes? 15 A. Yes, yes, sorry, yes, yes. 16 Q. And she actually physically examined her 17 knee? 18 A. Yes. 19 Q. And she asked Shalynne about her knee? 20 A. Yes, like where it was -- like if it was 21 hurting, yes. 22 Q. Okay. What else did you feel should have 23 been done during the exam that wasn't? 24 A. I just feel like -- like I say, I don't know 25 the whole procedure, but like I say, she asked for an</p>
<p style="text-align: right;">Page 54</p> <p>1 do no more, nothing else about it, and then they just 2 gave her a brace and some crutches and said -- and 3 then just let us go. 4 Q. And what I'm trying to make sure I'm clear on 5 is, there was nothing else that, you know, Shalynne 6 said I need this or I want this or, you know, you 7 haven't asked me about this and they said we can't 8 treat you, we won't treat you, other than the surgery? 9 A. Just the MRI. She just said she wanted an 10 MRI and they said that she couldn't -- that they 11 couldn't give it to her. 12 Q. So anything besides the MRI and the fact that 13 they couldn't do surgery? 14 A. That's all I can remember, was that it was -- 15 that they wouldn't give her an MRI. 16 Q. Did you get the impression that the PA 17 actually took her time and examined the knee? 18 A. I don't feel like she did because it was -- 19 because she wasn't there that long. You know, like 20 she was just like, she was there, she just talked and 21 then just -- and then she left and we didn't see her 22 again and then . . . 23 Q. What about it made you feel that she didn't, 24 just the duration of the time with you? 25 A. The duration, it's like it wasn't -- I guess</p>	<p style="text-align: right;">Page 56</p> <p>1 MRI, like I feel like she should have got the MRI, you 2 know, and I'm not -- like I say, I'm not 3 professionally whatever, but like they should have 4 like -- if they saw like the knee was red, it's like I 5 don't know, just like, like do more tests on it. They 6 should have did more tests, I feel like, other than 7 just an x-ray. 8 Q. Do you feel the PA was answering Shalynne's 9 questions? 10 A. Yeah, she answered them. 11 Q. Anybody else present during those 12 interactions with the PA other than you and Shalynne 13 and the PA herself? 14 A. I want to say her brother was in there, in 15 the room. 16 Q. Shalynne's brother? 17 A. I want to say yes. 18 Q. Who is that? 19 A. Josiah. 20 Q. What point did Josiah arrive? 21 A. About maybe like five, ten minutes after we 22 was in the room; maybe ten minutes after the room. 23 Q. So while you're in the ER treatment area, 24 after the x-ray but waiting for the PA, he arrived? 25 A. Um-hum.</p>